

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
RALEIGH DIVISION**

IN RE:

RAYNA DEE SCHAFFER,

**CASE NO. 21-00565-5-DMW
CHAPTER 13**

DEBTOR

DEBTOR'S VERIFIED MOTION TO EXTEND AUTOMATIC STAY

Now comes the Debtor, by and through counsel, and moves this court to order, under 11 U.S.C. § 362(c)(3), that the full protections of the automatic stay be extended in this case until terminated under 11 U.S.C. § 362(c)(1) or (2), or until further order of the court. In support of this motion, the Debtor shows the court as follows:

1. The Debtor filed the above-captioned case on March 12, 2021.

2. On March 13, 2019, the Debtor filed a prior chapter 13 case bearing the assigned Case No. 19-01153-5-DMW in the Eastern District of North Carolina. The court dismissed that case on March 11, 2021. The dismissal of the prior case was because of the following (*mark all that apply*):

- ☐ Debtor or Debtor's immediate family incurred significant medical expenses;
- X Debtor lost job/ had hours reduced/had wages reduced in the late summer of 2020 primary in relation to giving birth.
- ☐ Debtor incurred a significant expense on primary residence;
- ☐ Debtor incurred a significant expense on primary vehicle;
- ☐ Debtor incurred a significant expense related to a dependent (*if so, provide details*): *
- ☐ Other *

3. The Debtor's circumstances have substantially changed because (*mark all that apply*):

- ☐ Debtor now has new income in the form of additional work hours, an additional job, additional wages from previous job, and/or a new job. Provide details: *
- X Debtor now has new income in the form of monetary assistance from a third party individual. The Debtor's domestic partner / fiancé is contributing more based on his increased income and the needs of the household.
- X Debtor now has new income in the form of monetary assistance from a third party organization (*provide details*): The Debtor became eligible for unemployment compensation in the fall of 2020 at \$454.00 per week. She will receive benefits through September 2021.
- ☐ Debtor now has more available income in the form of reduced expenses (*provide details*): *

☐ Other: *

4. As required by E.D.N.C. LBR 4001-1 (d)(1), this motion (*mark appropriate box*)

X is filed within five (5) days of the petition date

☐ is NOT filed within five (5) days of the petition date.

5. The Debtor has demonstrated by clear and convincing evidence that the current case is filed in good faith. The Debtor's circumstances have substantially changed so that the reason for dismissal in the prior case is not likely to recur and this case can be completed.

Wherefore, the Debtor prays for the court to enter an order extending the automatic stay as to all creditors until it would terminate under 11 U.S.C. §§ 362(c)(1) or (2), or until further order of the court, and for such further relief as the court deems just and appropriate.

Dated: March 16, 2021



/s/Travis Sasser

Travis Sasser

Attorney for Debtor

Sasser Law Firm

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NC Bar No. 26707

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DECLARATION

Under penalty of perjury, I, **Rayna Dee Schafer**, hereby certify that I have personal knowledge of all the information contained in the pleading above and all information is true and accurate, to the best of my knowledge.

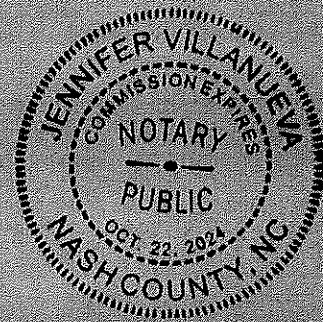
Rayna Dee Schafer
(Signed)

Rayna Dee Schafer,

Sworn and subscribed to me this the 16 day of March, 2021

Jennifer Villanueva
Notary Public Jennifer Villanueva

Notary Seal



END OF DOCUMENT

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
RALEIGH DIVISION**

IN RE:

RAYNA DEE SCHAFER,

**CASE NO. 21-00565-5-DMW
CHAPTER 13**


DEBTOR

NOTICE OF MOTION

NOTICE IS HEREBY GIVEN that a Motion to Continue Automatic Stay has been filed by the debtor. A copy of the motion accompanies this notice.

TAKE NOTICE FURTHER that pursuant to the Local Rules of the United States Bankruptcy Court for the Eastern District of North Carolina, you have fourteen (14) days from the date of this Notice of Motion to file a responsive pleading to the attached Motion. If a response is filed, a hearing on this motion will be heard at the United States Bankruptcy Court, Eastern District of North Carolina, Raleigh Division located at the Century Station Federal Building, 300 Fayetteville Street, Raleigh, North Carolina 27601 in the 3rd Floor Courtroom starting at 9:30 a.m. starting on April 7, 2021. You must file your response with the Clerk, United States Bankruptcy Court, Post Office Box 791, Raleigh, NC 27602 with a copy to the undersigned. Any such responsive pleading must contain a request for a hearing if, indeed, you wish to be heard by the Court. Unless a hearing is specifically requested in a responsive pleading, the attached Motion may be determined and final Orders entered by the court without a hearing.

Dated: March 16, 2021


/s/ Travis Sasser
Travis Sasser
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CERTIFICATE OF SERVICE

The foregoing debtor's Motion to be served on the following parties, by mailing a copy by depositing it in the United States Mail, by First Class Mail, in a properly addressed envelope with adequate postage thereon.

ALL PARTIES ON THE ATTACHED MAILING MATRIX

Dated: March 16, 2021



/s/ Travis Sasser

Travis Sasser

Attorney for Debtor

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AFNI, Inc.
Attn: Managing Agent/Bankruptcy
PO Box 3427
Bloomington, IL 61702-3427

Aaron's
PO Box 100039
Kennesaw, GA 30156-9239

Ashley Funding Services
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Bright Funeral Home
405 S Main Street
Wake Forest, NC 27587-2909

Capital One
Attn: Managing Agent/Bankruptcy
PO Box 30285
Salt Lake City, UT 84130-0285

Credit Acceptance Corporation
25505 West 12 Mile Road
Suite 3000
Southfield, MI 48034-8331

Elite Management Professionals
300 Nichols Farm Drive
Durham, NC 27703-3753

FSNB Bank
Attn: Managing agent
Post Office Box 33009
Fort Sill, OK 73503-0009

Farmington Oaks HOA
4112 Blue Ridge Road, Suite 100
Raleigh, NC 27612-4652

G & B Auto Sales
Attn: Managing Agent/Bankruptcy
2050 Highway 401 South
Louisburg, NC 27549-9047

Internal Revenue Service
Centralized Insolvency Operations
P. O. Box 7346
Philadelphia, PA 19101-7346

NC Department of Revenue
Office Serv. Div., Bankruptcy Unit
Post Office Box 1168
Raleigh, NC 27602-1168

Pinnacle Acceptance Corp
3269 US Hwy 1
Franklinton, NC 27525-8406

Rex Hospital
Attn: Managing Agent/Bankruptcy
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Charlotte, NC 28272-1058

Ridge Valley Exteriors, Inc.
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UNC Hospitals
Attn: Managing Agent/Bankruptcy
P.O. Box 71060
Charlotte, NC 28272-1060

US Department of Education
2401 International Lane
Madison, WI 53704-3121

US Department of Education
Direct Loans Service Center
P. O. Box 5606
Greenville, TX 75403-5609

WakeMed
Attn: Managing Agent/ Bankruptcy
Post Office Box 14465
Raleigh, NC 27690-2002

Wells Fargo Home Mortgage
Attn: Managing Agent/Bankruptcy
MAC# N9286-01Y 1000 Blue Gentian Rd
Saint Paul, MN 55121-7700

John F. Logan
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PO Box 61039
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